

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

January 19, 2023

## BY ECF

Honorable Denise Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Chet Stojanovich,  
22 Cr. 339 (DLC)

Dear Judge Cote:

I write to request that the Court modify the conditions of Mr. Stojanovich's bail release to impose a curfew, with the hours set at Pretrial Services' discretion, in lieu of home detention.

Moving Mr. Stojanovich to a curfew is appropriate in light of his long and ongoing compliance with Pretrial supervision and because it will facilitate his beneficial and rehabilitative activities. Mr. Stojanovich successfully transitioned from inpatient to intensive outpatient treatment in November: he now attends treatment three times per week and physical therapy two-to-three times per week. On home detention, Mr. Stojanovich is not always able to get approval in time to attend every session when times change or are scheduled with insufficient advance notice. Moving him to a curfew will resolve this difficulty and will also allow him engage in other positive activities in which he wishes to take part, including volunteer work and a sober-living meet-up on Sundays. Finally, a curfew will allow Mr. Stojanovich to take more frequent walks, as he has been advised to do by his neurologist, to help forestall the progression of his Charcot-Marie-Tooth disease.

Neither the government nor Pretrial Services has any objection to this request.

Respectfully submitted,

/s/

Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

cc: AUSA David Lewis  
USPSOs Christina Venable, Stacey Cooke, and Joey Trabucco (by email)

Approved.  
Jennifer L. Brown  
1/20/23